

Morgan Lewis

Michael F. Fleming

Associate
+1.212.309.6207
michael.fleming@morganlewis.com

APPLICATION GRANTED
SO ORDERED 

VERNON S. BRODERICK

U.S.D.J. 11/27/2019

November 26, 2019

Via ECF

The Honorable Vernon S. Broderick
United States District Court
For the Southern District of New York
40 Foley Square, Room 415
New York, NY 10007

Re: *Delacruz v. Target*, No. 1:19-cv-09851-VSB
Request to Extend Defendant's Time to Respond to Complaint

Dear Judge Broderick:

We represent defendant Target Corporation ("Defendant") in the above-referenced action. Pursuant to Rules I(A) and I(G) of Your Honor's Individual Practices, we write with the consent of counsel for plaintiff Emanuel Delacruz ("Plaintiff"), respectfully to request that the Court extend Defendant's time to respond to the Complaint from December 2, 2019 to January 1, 2020. This is Defendant's first request for an extension of time to file a response to the Complaint.

In support of this request, counsel for Defendant states that it recently has been engaged in this matter and needs time to become familiar with the relevant facts and allegations. As noted above, Plaintiff's counsel consents to this request. If granted, this extension will not affect any other date scheduled in this action.

We thank the Court in advance for its consideration of this request.

Respectfully submitted,

/s/ Michael F. Fleming



Michael F. Fleming

Attorney for Defendant

cc: All Counsel of Record (via ECF)

Morgan, Lewis & Bockius LLP

101 Park Avenue
New York, NY 10178-0060
United States

 +1.212.309.6000
 +1.212.309.6001